# Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: Dexter Foundry, Inc.

Facility Location: 905 West Depot

Fairfield, IA 52556

Air Quality Operating Permit Number: 99-TV-058R1

**Expiration Date: 12/10/2013** 

Permit Renewal Application Deadline: 6/9/2013

**EIQ Number: 92-1370** 

Facility File Number: 51-01-005

# **Responsible Official**

Name: Thomas R. Jones

**Title: President** 

Mailing Address: PO Box 7901, Fairfield, IA 52556

Phone #: (641) 472-7078, Ext 239

#### **Permit Contact Person for the Facility**

Name: Julie M. Christensen

Title: Environmental and Safety Manager

Mailing Address: PO Box 7901, Fairfield, IA 52556

Phone #: (641) 472-7078, Ext 367

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

# For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section Date

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# **Abbreviations**

acfm	.actual cubic feet per minute
CFR	.Code of Federal Regulation
CE	.control equipment
CEM	.continuous emission monitor
cu ft/hr	.cubic feet per hour
°F	.degrees Fahrenheit
	.emissions inventory questionnaire
EP	emission point
EU	.emission unit
gr./dscf	grains per dry standard cubic foot
gr./100 cf	grains per one hundred cubic feet
IAC	.Iowa Administrative Code
IDNR	.Iowa Department of Natural Resources
MVAC	.motor vehicle air conditioner
NAICS	.North American Industry Classification System
	.new source performance standard
ppmv	parts per million by volume
lb./hr	.pounds per hour
lb./MMBtu	pounds per million British thermal units
SCC	.Source Classification Codes
	standard cubic feet per minute
SIC	.Standard Industrial Classification
TPY	.tons per year
USEPA	.United States Environmental Protection Agency
<b>Pollutants</b>	
PM	•
	particulate matter ten microns or less in diameter
SO <sub>2</sub>	
NO <sub>x</sub>	
	volatile organic compound.
CO	
HAP	.hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: Dexter Foundry, Inc. Permit Number: 99-TV-058R1

Facility Description: Gray and Ductile Iron Foundry (SIC 3321)

# **Equipment List**

Emission Point Number	Emission Unit Number	<b>Emission Unit Description</b>	IDNR Construction Permit Number
EP 101F	EU 101	Scrap Handling; Iron	
EP 201	EU 102	Cupola	92-A-474-S7
	EU 103,	Two (2) Induction Furnaces,	
	EU 106-Baghouse,	Disa C Mold, Pour & Cool,	
	EU 110,	Disa C Shakeout,	
EP 240	EU 117C,	Disa C Muller,	08-A-222-P
EP 240	EU 130,	Disa Sand Return,	08-A-222-P
	EU 146,	Tumblers 5 & 6; Castings,	
	EU 155,	Disa A & B Muller Bin,	
	EU 156	Disa C Muller Bin	
	EU 105-Baghouse,	Disa A & B Mold, Pour & Cool,	
ED 202	EU 108,	20 x 26 Shakeout,	05 4 201 02
EP 203	EU 109,	Disa A & B Shakeout,	95-A-381-S3
	EU 121	20 x 26 Automold	
EP 235-Vent	EU 105-Vent 235,	Disa A & B Mold, Pour & Cool,	00 4 222
EP 233-Vent	EU 106-Vent 235	Disa C Mold, Pour & Cool	08-A-223
ED 226 Vant	EU 105-Vent 236,	Disa A & B Mold, Pour & Cool,	00 4 224
EP 236-Vent	EU 106-Vent 236	Disa C Mold, Pour & Cool	08-A-224
EP 104F	EU 104	Manual Pour & Cool	
	EU 107,	Manual Shakeout,	
ED 205	EU 118,	Manual Muller,	88-A-014-S2
EP 205	EU 129,	Manual Sand Return,	
	EU 154	Manual Muller Bin	
	EU 111,	Tumbler 1; Castings,	
EP 111F	EU 113,	Tumbler 2; Castings,	
	EU 114-111F	Grinding; Castings	
ED 112E	EU 112,	Tumblers 3 & 4; Castings,	
EP 112F	EU 114-112F	Grinding; Castings	
EP 114F	EU 114-114F	Grinding; Castings	
ED 200	EU 117AB,	Disa A & B Muller,	95-A-380-S2
EP 208	EU 153	Manual Dump Station	

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
EP 119F	EU 119	Prepared Sand Transfer	
EP 120F	EU 120	Manual Mold	
EP 122F	EU 122	Resin Sand Storage	
EP 211	EU 123	Core Sand Storage	86-A-043-S2
EP 124F	EU 124	Shell Core Making	
EP 238-Exhaust	EU 126-Exhaust 238	Isocure Core Making	05-A-564-S2
EP 239-Exhaust	EU 126-Exhaust 239	Isocure Core Making	05-A-565-S2
EP 147F	EU 147	Haul Road; VMT	
EP 148F	EU 148	Charging Chute; Scrap	
EP 149F	EU 149	Coke Storage Pile	
EP 150F	EU 150	Limestone Storage Pile	
EP 230-Vent	EU 157-Vent 230	Metal Transfers	04-A-386
EP 231-Vent	EU 157-Vent 231	Metal Transfers	04-A-387
EP 232-Vent	EU 157-Vent 232	Metal Transfers	04-A-388
EP 233-Vent	EU 157-Vent 233	Metal Transfers	04-A-389
EP 234-Vent	EU 157-Vent 234	Metal Transfers	04-A-390
EP 158F	EU 158	Yard Traffic	
EP 159F	EU 159	Temporary Sand Storage Pile	
EP 160F	EU 160	Permanent Sand Storage Pile	

# **Insignificant Activities Equipment List**

Insignificant Emission Unit Number	Insignificant Emission Unit Description
127	Shell Core Curing (0.74 MMBtu/hr)
128	Core Curing Oven (0.30 MMBtu/hr)
137	Emergency Generator, Fuel Oil (1)
139	Gasoline Tank (300 gal)
140	Waste Oil Tank (1,500 gallons capacity)
141	No. 2 Distillate Tank (250 gallons capacity)
142	No. 2 Distillate Tank (250 gallons capacity)
143	No. 2 Distillate Tank (300 gallons capacity)
144	Gasoline Tank (250 gallons capacity)
145	6 Air Make Up Units (5.2 MMBtu/hr each)
152	Emergency Generator, Fuel Oil (1)

<sup>(1)</sup> This engine is an affected unit under 40 CFR 63 Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines. However, according to 40 CFR 63.6590(b)(3), this existing stationary engine is not required to meet the requirements of 40 CFR 63 Subparts A or ZZZZ.

# **II. Plant-Wide Conditions**

Facility Name: Dexter Foundry, Inc. Permit Number: 99-TV-058R1

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

#### **Permit Duration**

The term of this permit is: Five (5) years

Commencing on: 12/10/2008

Ending on: 12/9/2013

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

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#### **Emission Limits**

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

Single HAP: 9.4 Tons/year

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Iowa DNR Construction Permit 05-A-565-S2

Total HAP: 24.4 Tons/year

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Iowa DNR Construction Permit 05-A-565-S2

#### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or

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amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
- 4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

#### **Compliance Plan**

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Dexter Foundry, Inc. is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Dexter Foundry, Inc. shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

# **NSPS and NESHAP Applicability**

The emissions units of Dexter Foundry, Inc. are not subject to a NSPS subpart at this time.

The operations at this facility are subject to the requirements of 40 CFR 63 of Subpart ZZZZZ, "National Emission Standards for Iron and Steel Foundries Area Sources". Authority for Requirement: 40 CFR Part 63 Subpart ZZZZZ

The operations at this facility are not subject to the requirements of 40 CFR, Part 63, Subpart EEEEE, "National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries". The facility has construction permits that limit the potential to emit of a single hazardous air pollutant from the facility to 9.4 tons per year and that limit the potential to emit of total hazardous air pollutants from the facility to 24.4 tons per year.

Therefore, in accordance with section 63.7681, the facility is not a major source of HAP emissions, and the requirements of Subpart EEEEE do not apply.

The facility has requested federally enforceable limits on the Isocure Core Making (EU 126) in order to limit the emissions of Hazardous Air Pollutants (HAPs). The requested limits have been written into the construction permits for the Isocure Core Making (Permits 05-A-564-S2 & 05-A-565-S2).

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Iowa DNR Construction Permit 05-A-565-S2

# **III. Emission Point-Specific Conditions**

Facility Name: Dexter Foundry, Inc. Permit Number: 99-TV-058R1
Emission Point ID Number: EP 101F
Associated Equipment
Associated Emission Unit ID Numbers: EU 101
Emission Unit vented through this Emission Point: EU 101 Emission Unit Description: Scrap Handling; Iron Raw Material/Fuel: Iron Rated Capacity: 20 tons/hour
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Authority for Requirement: 567 IAC 22.108(3)

Agency Approved Operation & Maintenance Plan Required?

**Facility Maintained Operation & Maintenance Plan Required?** 

**Compliance Assurance Monitoring (CAM) Plan Required?** 

Yes 🗌 No 🖂

Yes 🗌 No 🖂

Yes 🗌 No 🖂

# **Emission Point ID Number: EP 201**

# **Associated Equipment**

Associated Emission Unit ID Numbers: EU 102

Emissions Control Equipment ID Number: CE 301, CE 312

Emissions Control Equipment Description: Baghouse, Afterburner

Emission Unit vented through this Emission Point: EU 102

Emission Unit Description: Cupola

Raw Material/Fuel: Iron Rated Capacity: 20 tons/hour

# **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

(1) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf, 30.63 Tons/year Authority for Requirement: 567 IAC 23.3(2)"a"

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Pollutant: PM-10

Emission Limit(s): 4.5 lb/hr, 19.7 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv, 23.7 lb/hr, 54.36 tons/year

Authority for Requirement: 567 IAC 23.3(3)

Iowa DNR Construction Permit 92-A-474-S7

Pollutant: Nitrogen Oxide (NOx)

Emission Limit(s): 32.76 lb/hr, 73.44 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

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Pollutant: Carbon Monoxide (CO)

Emission Limit(s): 29 lb/hr, 129.54 Tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

Pollutant: Lead (Pb)

Emission Limit(s): 0.55 lb/hr, 1.13 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operating Limits**

- A. The maximum sulfur content of any coke used in this cupola shall not exceed 0.7 percent by weight.
- B. The maximum and routine (90% operating time) temperature of the gas stream entering the baghouse shall be 500 degrees F and 450 degrees F respectively. A temperature monitoring device must be properly installed, calibrated and maintained, which continuously measures the inlet gas temperature to the baghouse.
- C. A maximum of 91,800 tons per 12 month (rolled monthly) of either steel, scrap iron or silver pig is permitted to be melted using this cupola. This limit allows this permit to be a synthetic minor. It cannot be removed unless additional control equipment is put on to control NO<sub>x</sub> and lead, or a PSD permit (minimum one year after startup under permit 92-A-474-S4) is obtained.
- D. The pressure drop range of the baghouse must be consistent with the manufacturer's recommendations and specifications and must be consistent with the values observed during the stack test.

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

# Reporting and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The quantity of gray iron produced in this emission unit (in tons). Calculate and record the monthly and twelve (12) month rolling totals.
- B. The weight percent of sulfur in the coke used in this emission unit.
- C. The inlet gas temperature to the baghouse.
- D. The pressure drop of the baghouse.

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

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#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 90 Stack Diameter (inches, dia.): 48 Exhaust Flow Rate (scfm): 40,000 Exhaust Temperature (°F): 175

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S7

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE 301 Baghouse**

#### **Emission Unit**

• Associated Emission Unit: EU 102, Cupola

Associated Emission Point: EP 201Control Equipment: Baghouse CE 301

• Pollutant Controlled: Particulate Matter (PM), PM-10, Lead, HAPs

# **Applicable Requirements**

See Construction Permit 92-A-474-S7

# **Monitoring Approach**

#### General Monitoring Guidelines

• CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.

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- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emission monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

# **Excursion from Compliance Indicators**

- An <u>excursion</u> occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- Dexter will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective action will result in one of the following:
  - o If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - o If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emission, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, then an <u>indicator opacity exceedence</u> has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, Dexter will perform the following follow-up actions, *as applicable*:
  - o Continue corrective actions.
  - o Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emission).
  - o Promptly orally report the indicator opacity exceedance, file a written indicator opacity exceedance report to both field office and central office (Compliance Unit) of IDNR.
  - o Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); within seven days of the excess emissions, file a written excess emissions report with both the field office and central office (Compliance Unit) of IDNR.
  - o Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with the emission limit, Dexter will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with the emission limit, Dexter will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.

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 Report monitoring or other deviations (operating conditions, emissions limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

### Compliance Indicator Ranges

- Visible Emissions
  - Observation of no visible emissions.
- Differential Pressure
  - o Acceptable indicator range: 0" to 8" W.C., due to variable frequency drive fan on cupola.

# **Monitoring Methods**

- Daily
  - o Check for dust collector differential pressure.
- Weekly
  - o Observe for visible emissions during material handling of unit.
  - o Check for dust collector differential pressure.
- Monthly
  - o Inspect dust collector cleaning sequence
  - o Check hopper function and performance.
- Quarterly
  - o Inspect bags for leaks and wear
- Semi-Annually
  - o Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

#### **Performance Criteria**

#### Data Representativeness

An observation of visible emissions could indicate a decrease in the performance of the dust collector and an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate performance by the dust collector and potentially an increase in particulate emissions.

# Record Keeping and Reporting (Verification of Operational Status)

- Dexter will maintain records of the following:
  - o Daily logs of differential pressure readings.
  - Weekly logs of emissions observations.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance.
     The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - o All corrective actions resulting from compliance indicators and inspections and maintenance
  - o Excursion, indicator opacity exceedence, and excess emissions reports.
- Records will be kept for at least five (5) years and be available to the IDNR upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- Dexter will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspection performed on the dust collector and actions resulting from the inspection.

#### Justification

# Selection of Compliance Indicators

Visible emissions and differential pressure readings were selected as performance indicators because they demonstrate the dust collector's function of collecting particulate matter (effectiveness of cleaning cycle, loose or collapsed bag, etc.). How well the dust collector collects particulate matter will demonstrate the likelihood of compliance with applicable requirements.

# Selection of Compliance Indicator Ranges

The ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendation for the indicators.

#### Test Data

Particulate emissions testing was completed October 11, 2001. Normal baghouse operations were observed during the test.

Authority for Requirement: 567 IAC 22.108(3)

#### CAM Plan for CE 312 Afterburner

#### **Emission Unit**

• Associated Emission Unit: EU 102, Cupola

• Associated Emission Point: EP 201

• Control Equipment: Afterburner CE 312

• Pollutant Controlled: VOC, CO, HAPs

# Applicable Requirements

See Construction Permit 92-A-474-S7

# **Monitoring Approach**

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment <u>compliance indicators</u>, such as
  temperature in the cupola secondary combustion zone. This plan defines acceptable ranges
  for these indicators. CAM also includes control equipment maintenance and inspections.
  Maintenance and inspections that will facilitate consistent control equipment operations are
  identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.

# **Excursion from Compliance Indicators**

- An <u>excursion</u> occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- Dexter will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective action will result in one of the following:
  - o If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - o If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, Dexter will perform the following follow-up actions, *as applicable*:
  - o Continue corrective actions.
  - o Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emission).
  - o Promptly orally report the indicator opacity exceedance, file a written indicator opacity exceedance report to both field office and central office (Compliance Unit) of IDNR.
  - o Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); within seven days of the excess emissions, file a written excess emissions report with both the field office and central office (Compliance Unit) of IDNR.
  - o Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with the emission limit, Dexter will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with the emission limit, Dexter will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emissions limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

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#### **Compliance Indicator Ranges**

- Cupola Secondary Combustion Zone Temperature
  - o 1200°F to 1800°F with a target range of 1500°F to 1600°F

### **Monitoring Methods**

- Daily
  - Operator observes temperature of secondary combustion zone. The temperature is continuously monitored electronically and alarms are set at the temperature limits.
- Weekly
  - o Maintenance personnel inspect and maintain integrity and function of cupola according to established operating procedures.
  - o Maintenance personnel inspect and maintain integrity and function of afterburner according to established operating procedures.

#### **Performance Criteria**

#### <u>Data Representativeness</u>

Measurement of the secondary combustion zone temperature is a determination of the afterburner destruction efficiency. Combustion is used in this zone of the cupola to convert pollutants into carbon dioxide and water. As such, the temperature at this location is a primary variable affecting the afterburners combustion effectiveness. Outside of a particular temperature range, combustion will be increasingly incomplete.

# Record Keeping and Reporting (Verification of Operational Status)

- Dexter will maintain records of the following:
  - o Daily operator paper logs of temperature reading.
  - o Weekly paper logs of inspection and maintenance procedures (complete work orders).
  - o All corrective actions resulting from compliance indicators and inspections and maintenance.
  - o Excursion and excess emissions reports.
- Records will be kept for at least five (5) years and be available to the IDNR upon request.

# **Quality Control**

- Afterburners and monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- Dexter will maintain an adequate inventory of spare parts.

# **Data Collection Procedures**

- Operators record the cupola secondary combustion zone temperature on paper logs.
   Operators obtain the temperature through the electronic system on the cupola that measure and displays the temperature.
- Maintenance personnel record all maintenance/inspection performed on the cupola and afterburner and actions resulting from the inspection on paper logs.

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#### Justification

# Selection of Compliance Indicators

As a measurement of destruction efficiency, temperature at the point of combustion is a primary predictor of pollution control for an afterburner.

# Selection of Compliance Indicator Ranges

The temperature zone ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendation for the indicators.

# Test Data

Carbon Monoxide (CO) emissions testing was completed December 14, 2000 and October 8, 2002. Normal secondary combustion zone temperatures were observed during the test.

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: EP 240**

**Associated Equipment** 

Associated Emission Unit ID Numbers: EU 103, EU 106-Baghouse, EU 110, EU 117C,

EU 130, EU 146, EU 155 & EU 156

Emissions Control Equipment ID Number: CE 313 & CE 317 Emissions Control Equipment Description: Two (2) Baghouses

Emission Unit vented through this Emission Point: EU 103 Emission Unit Description: Two (2) Induction Furnaces

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons metal melt/hour (total)

Emission Unit vented through this Emission Point: EU 106-Baghouse

Emission Unit Description: Disa C Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 8.7 tons metal melt/hour

Emission Unit vented through this Emission Point: EU 110

Emission Unit Description: Disa C Shakeout

Raw Material/Fuel: Metal Castings Rated Capacity: 8.7 tons/hour

Emission Unit vented through this Emission Point: EU 117C

Emission Unit Description: Disa C Muller

Raw Material/Fuel: Sand

Rated Capacity: 100 tons sand/hour

Emission Unit vented through this Emission Point: EU 130

Emission Unit Description: Disa Sand Return

Raw Material/Fuel: Sand

Rated Capacity: 185 tons sand/hour

Emission Unit vented through this Emission Point: EU 146 Emission Unit Description: Tumblers 5 & 6; Castings

Raw Material/Fuel: Metal Castings Rated Capacity: 18 tons/hour

Emission Unit vented through this Emission Point: EU 155

Emission Unit Description: Disa A & B Muller Bin

Raw Material/Fuel: Sand & Bond Rated Capacity: 140 tons/hour

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Emission Unit vented through this Emission Point: EU 156

Emission Unit Description: Disa C Muller Bin

Raw Material/Fuel: Sand & Bond

Rated Capacity: 140 tons sand & bond/hour

# **Applicable Requirements**

# BACT Emission Limits for the Induction Furnaces—EU 103 (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Particulate Matter (PM)

Emission Limits: 0.042 lb/ton, 2.48 tons/year

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P

Pollutant: PM-10

Emission Limit(s): 0.042 lb/ton, 2.48 tons/year

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P

# Emission Limits for the Stack—EP-240 (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 0 % (1)

(1) The indicator opacity for this emission point would be "no visible emissions". However, in order to be consistent with the BACT opacity standard and in order to demonstrate compliance with the BACT opacity limit, the opacity limit for the stack is also being set at 0%. An exceedance of the indicator opacity of 0% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 08-A-222-P

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 08-A-222-P

Pollutant: PM-10

Emission Limit(s): 6.17 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P

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#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 90

Stack Opening, (inches, dia.): 72 Exhaust Flow Rate (scfm): 91,000 Exhaust Temperature (°F): 100

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

# **Stack Testing:**

Pollutant - Opacity

Stack Test to be Completed by (date): Within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

Test Method - 40 CFR 60, Appendix A, Method 9

Authority for Requirement - Iowa DNR Construction Permit 08-A-222-P

Pollutant - Particulate Matter (PM) (1)

Stack Test to be Completed by (date): Within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

Test Method - Iowa Compliance Sampling Manual Method 5

(1) Testing is required to demonstrate compliance with the BACT limits (Induction Furnaces only) and with the limits on the stack (EP 240).

Authority for Requirement - Iowa DNR Construction Permit 08-A-222-P

Pollutant - PM-10 (1)

Stack Test to be Completed by (date): Within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

Test Method - 40 CFR 51, Appendix M, 201A with 202

(1) Testing is required to demonstrate compliance with the BACT limits (Induction Furnaces only) and with the limits on the stack (EP 240).

Authority for Requirement - Iowa DNR Construction Permit 08-A-222-P

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The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

 Agency Approved Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Facility Maintained Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Compliance Assurance Monitoring (CAM) Plan Required?
 Yes ⋈ No □

# **CAM Plan for CE 313 Baghouse**

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Unit**

Associated Emission Unit: EU 106-Baghouse, Disa C Mold, Pour & Cool

EU 110, Disa C Shakeout EU 117, Disa C Muller EU 130, Disa Sand Return EU 146, Tumblers 5 & 6 Casting EU 155, Disa A & B Muller Bin EU 156, Disa C Muller Bin

• Associated Emission Point: EP 240

Control Equipment: Baghouse CE 313
Pollutant Controlled: Particulate Matter (PM), PM-10, Lead, HAPs

# **Applicable Requirements**

See Construction Permit 08-A-222-P

#### **Monitoring Approach**

#### General Monitoring Guidelines

- CAM involves the observation of control equipment <u>compliance indicators</u>, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emission monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

99-TV-058R1 22 December 10<sup>th</sup>, 2008

# **Excursion from Compliance Indicators**

- An <u>excursion</u> occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- Dexter will take <u>corrective action</u> in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective action will result in one of the following:
  - o If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - o If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emission, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, then an <u>indicator opacity exceedence</u> has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, Dexter will perform the following follow-up actions, *as applicable*:
  - Continue corrective actions.
  - o Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emission).
  - o Promptly orally report the indicator opacity exceedance, file a written indicator opacity exceedance report to both field office and central office (Compliance Unit) of IDNR.
  - o Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); within seven days of the excess emissions, file a written excess emissions report with both the field office and central office (Compliance Unit) of IDNR.
  - o Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with the emission limit, Dexter will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with the emission limit, Dexter will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emissions limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

# Compliance Indicator Ranges

- Visible Emissions
  - o Observation of no visible emissions.
- Differential Pressure
  - o Applicable indicator range: 5" to 8" W.C.

99-TV-058R1 23 December 10<sup>th</sup>, 2008

#### Monitoring Methods

- Daily
  - o Check for dust collector differential pressure.
- Weekly
  - o Observe for visible emissions during material handling of unit.
  - o Check for dust collector differential pressure.
- Monthly
  - o Inspect dust collector cleaning sequence
  - o Check hopper function and performance.
- Quarterly
  - o Inspect bags for leaks and wear
- Semi-Annually
  - o Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

#### **Performance Criteria**

# Data Representativeness

An observation of visible emissions could indicate a decrease in the performance of the dust collector and an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate performance by the dust collector and potentially an increase in particulate emissions.

# Record Keeping and Reporting (Verification of Operational Status)

- Dexter will maintain records of the following:
  - o Daily logs of differential pressure readings.
  - o Weekly logs of emissions observations.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance.
     The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - o All corrective actions resulting from compliance indicators and inspections and maintenance
  - o Excursion, indicator opacity exceedence, and excess emissions reports.
- Records will be kept for at least five (5) years and be available to the IDNR upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- Dexter will maintain an adequate inventory of spare parts.

# **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspection performed on the dust collector and actions resulting from the inspection.

99-TV-058R1 24 December 10<sup>th</sup>, 2008

#### Justification

# Selection of Compliance Indicators

Visible emissions and differential pressure readings were selected as performance indicators because they demonstrate the dust collector's function of collecting particulate matter (effectiveness of cleaning cycle, loose or collapsed bag, etc.). How well the dust collector collects particulate matter will demonstrate the likelihood of compliance with applicable requirements.

# Selection of Compliance Indicator Ranges

The ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendation for the indicators.

#### Test Data

Particulate emissions testing were completed May 9, 2000, July 11, 2000 and November 15, 2001 for the baghouse before the Disa Muller Bins were added. Normal baghouse operations were observed during the tests.

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE 317 Baghouse**

#### **Emission Unit**

• Associated Emission Unit: EU 103, Induction Furnaces

• Associated Emission Point: EP 240

• Control Equipment: Baghouse CE 317

• Pollutant Controlled: Particulate Matter (PM), PM-10, Lead, HAPs

#### Applicable Requirements

See Construction Permit 08-A-222-P

#### **Monitoring Approach**

#### General Monitoring Guidelines

- CAM involves the observation of control equipment <u>compliance indicators</u>, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emission monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

# **Excursion from Compliance Indicators**

- An <u>excursion</u> occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- Dexter will take <u>corrective action</u> in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective action will result in one of the following:
  - o If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - o If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emission, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, then an <u>indicator opacity exceedence</u> has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, Dexter will perform the following follow-up actions, *as applicable*:
  - Continue corrective actions.
  - o Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emission).
  - o Promptly orally report the indicator opacity exceedance, file a written indicator opacity exceedance report to both field office and central office (Compliance Unit) of IDNR.
  - o Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); within seven days of the excess emissions, file a written excess emissions report with both the field office and central office (Compliance Unit) of IDNR.
  - o Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with the emission limit, Dexter will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with the emission limit, Dexter will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emissions limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

# Compliance Indicator Ranges

- Visible Emissions
  - o Observation of no visible emissions.
- Differential Pressure
  - o 5" to 7" W.C.

99-TV-058R1 26 December 10<sup>th</sup>, 2008

#### Monitoring Methods

- Daily
  - o Check for dust collector differential pressure.
- Weekly
  - o Observe for visible emissions during material handling of unit.
  - o Check for dust collector differential pressure.
- Monthly
  - Inspect dust collector cleaning sequence
  - o Check hopper function and performance.
- Quarterly
  - o Inspect bags for leaks and wear
- Semi-Annually
  - o Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

#### **Performance Criteria**

#### Data Representativeness

An observation of visible emissions could indicate a decrease in the performance of the dust collector and an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate performance by the dust collector and potentially an increase in particulate emissions.

# Record Keeping and Reporting (Verification of Operational Status)

- Dexter will maintain records of the following:
  - o Daily logs of differential pressure readings.
  - Weekly logs of emissions observations.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance.
     The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - All corrective actions resulting from compliance indicators and inspections and maintenance.
  - o Excursion, indicator opacity exceedence, and excess emissions reports.
- Records will be kept for at least five (5) years and be available to the IDNR upon request.

### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- Dexter will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspection performed on the dust collector and actions resulting from the inspection.

99-TV-058R1 27 December 10<sup>th</sup>, 2008

#### Justification

# Selection of Compliance Indicators

Visible emissions and differential pressure readings were selected as performance indicators because they demonstrate the dust collector's function of collecting particulate matter (effectiveness of cleaning cycle, loose or collapsed bag, etc.). How well the dust collector collects particulate matter will demonstrate the likelihood of compliance with applicable requirements.

# Selection of Compliance Indicator Ranges

The ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendation for the indicators.

# Test Data

Particulate emissions testing were completed on October 16<sup>th</sup>, 2008. Normal baghouse operations were observed during the test.

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: 203**

# **Associated Equipment**

Associated Emission Unit ID Numbers: EU 105-Baghouse, EU 108, EU 109, EU 121

Emissions Control Equipment ID Number: CE 302 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 105-Baghouse

Emission Unit Description: Disa A & B Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 14.0 tons metal melt/hr (total for 2 lines)

Emission Unit vented through this Emission Point: EU 108

Emission Unit Description: 20 x 26 Shakeout

Raw Material/Fuel: Metal Castings

Rated Capacity: 4.0 tons/hr

Emission Unit vented through this Emission Point: EU 109

Emission Unit Description: Disa A (RS-60) & Disa B (MD-50) Shakeouts

Raw Material/Fuel: Metal Castings

Rated Capacity: 14.0 tons/hr (total for 2 Didions)

Emission Unit vented through this Emission Point: EU 121

Emission Unit Description: 20 x 26 Automold

Raw Material/Fuel: Sand Rated Capacity: 38.0 tons/hr

# **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 95-A-381-S3

99-TV-058R1 29 December 10<sup>th</sup>, 2008

Pollutant: Particulate Matter (PM)

Emission Limits: 0.05 gr/dscf, 5.57 lb/hr. Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 95-A-381-S3

Pollutant: PM-10

Emission Limit(s): 3.29 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S3

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv, 0.2 lb/hr

Authority for Requirement: 567 IAC 23.3(3)"e"

Iowa DNR Construction Permit 95-A-381-S3

Pollutant: Nitrogen Oxide (NO<sub>x</sub>) Emission Limit(s): 1.4 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S3

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 6.5 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S3

Pollutant: Lead (Pb)

Emission Limit(s): 0.007 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S3

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Limits**

Operating limits for these emission units shall be:

A. Mold making in these units shall be limited to a green sand binding system with a seacoal additive.

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S3

99-TV-058R1 30 December 10<sup>th</sup>, 2008

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 70 Stack Opening, (inches, dia.): 60 Exhaust Flow Rate (scfm): 65,000 Exhaust Temperature (°F): 200

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S3

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE-302 Baghouse**

### **Emission Unit**

• Associated Emission Unit: EU 105-Baghouse, Disa A & B Mold, Pour & Cool

EU 108, 20 x 26 Shakeout

EU 109, Disa A (RS-60) & Disa B (MD-50) Shakeouts

EU 121, 20 x 26 Automold

• Associated Emission Point: EP 203

• Control Equipment: Baghouse CE 302

Pollutant Controlled: Particulate Matter (PM), PM-10, Lead, HAPs

# **Applicable Requirements**

See Iowa DNR Construction Permit 95-A-381-S3

99-TV-058R1 31 December 10<sup>th</sup>, 2008

# **Monitoring Approach**

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment <u>compliance indicators</u>, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emission monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

# **Excursion from Compliance Indicators**

- An <u>excursion</u> occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- Dexter will take <u>corrective action</u> in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective action will result in one of the following:
  - o If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - o If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emission, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, then an <u>indicator opacity exceedence</u> has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a <u>violation</u> has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, Dexter will perform the following follow-up actions, *as applicable*:
  - o Continue corrective actions.
  - o Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emission).
  - o Promptly orally report the indicator opacity exceedance, file a written indicator opacity exceedance report to both field office and central office (Compliance Unit) of IDNR.
  - Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); within seven days of the excess emissions, file a written excess emissions report with both the field office and central office (Compliance Unit) of IDNR.

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- o Conduct source testing within 90 days of the excursion to demonstrate compliance.
  - If the test demonstrates compliance with the emission limit, Dexter will determine new indicator ranges for monitoring.
  - If the test demonstrates noncompliance with the emission limit, Dexter will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
- Report monitoring or other deviations (operating conditions, emissions limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

#### Compliance Indicator Ranges

- Daily
  - o Check for dust collector differential pressure.
- Visible Emissions
  - o Observation of no visible emissions.
- Differential Pressure
  - o Acceptable indicator range: 5" to 8" W.C.

# **Monitoring Methods**

- Weekly
  - o Observe for visible emissions during material handling of unit.
  - o Check for dust collector differential pressure.
- Monthly
  - o Inspect dust collector cleaning sequence
  - o Check hopper function and performance.
- Quarterly
  - o Inspect bags for leaks and wear
- Semi-Annually
  - o Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

#### **Performance Criteria**

#### Data Representativeness

An observation of visible emissions could indicate a decrease in the performance of the dust collector and an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate performance by the dust collector and potentially an increase in particulate emissions.

# Record Keeping and Reporting (Verification of Operational Status)

- Dexter will maintain records of the following:
  - o Daily logs of differential pressure readings.
  - Weekly logs of emissions observations.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance.
     The date, time, and the location of the bag in relationship to the other bags must document bag replacement.

- All corrective actions resulting from compliance indicators and inspections and maintenance.
- o Excursion, indicator opacity exceedence, and excess emissions reports.
- Records will be kept for at least five (5) years and be available to the IDNR upon request.

### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- Dexter will maintain an adequate inventory of spare parts.

# **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspection performed on the dust collector and actions resulting from the inspection.

#### Justification

# Selection of Compliance Indicators

Visible emissions and differential pressure readings were selected as performance indicators because they demonstrate the dust collector's function of collecting particulate matter (effectiveness of cleaning cycle, loose or collapsed bag, etc.). How well the dust collector collects particulate matter will demonstrate the likelihood of compliance with applicable requirements.

# Selection of Compliance Indicator Ranges

The ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendation for the indicators.

#### Test Data

Particulate emissions testing was completed October 2, 2007. Normal baghouse operations were observed during the test.

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: EP 235-Vent**

# **Associated Equipment**

Associated Emission Unit ID Numbers: EU 105-Vent 235, EU 106-Vent 235

\_\_\_\_\_

Emission Unit vented through this Emission Point: EU 105-Vent 235

Emission Unit Description: Disa A & B Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 14 Tons of Metal/hour

Emission Unit vented through this Emission Point: EU 106-Vent 235

Emission Unit Description: Disa C Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 8.7 tons of Metal/hour

# **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: No VE (1)

(1) Opacity limit for this emission point is "no visible emissions".

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 08-A-223

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 08-A-223

Pollutant: PM-10

Emission Limit(s): 1.2 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 08-A-223

99-TV-058R1 35 December 10<sup>th</sup>, 2008

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 41 Stack Diameter (inches, dia.): 52.8 Exhaust Flow Rate (scfm): 33,500 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 08-A-223

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

#### **Emission Point ID Number: EP 236-Vent**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 105-Vent 236, EU 106-Vent 236

Emission Unit vented through this Emission Point: EU 105-Vent 236

Emission Unit Description: Disa A & B Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 14 tons of Metal/hour

Emission Unit vented through this Emission Point: EU 106-Vent 236

Emission Unit Description: Disa C Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 8.7 tons of Metal/hour

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 08-A-224

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 08-A-224

Pollutant: PM-10

Emission Limit(s): 1.2 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 08-A-224

99-TV-058R1 37 December 10<sup>th</sup>, 2008

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 41 Stack Diameter (inches, dia.): 52.8 Exhaust Flow Rate (scfm): 36,500 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 08-A-224

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: EP 104F (Internally Vented)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 104	
Emission Unit vented through this Emission Point: EU 104 Emission Unit Description: Manual Pour and Cool Raw Material/Fuel: Metal Melt Rated Capacity: 10.92 tons/hr	
<b>Applicable Requirements</b>	
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified	d below.
Pollutant: Opacity Emission Limits: 40 % Authority for Requirement: 567 IAC 23.3(2)"d"	
Pollutant: Particulate Matter (PM) Emission Limits: 0.1gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a"	
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring rebelow.	equirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

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### **Emission Point ID Number: EP 205**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 107, EU 118, EU 129, EU 154

Emissions Control Equipment ID Number: CE 304 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 107

Emission Unit Description: Manual Shakeout

Raw Material/Fuel: Metal Castings Rated Capacity: 10.92 tons/hr

Emission Unit vented through this Emission Point: EU 118

Emission Unit Description: Manual Muller

Raw Material/Fuel: Sand Rated Capacity: 98 tons/hr

Emission Unit vented through this Emission Point: EU 129

Emission Unit Description: Manual Sand Return

Raw Material/Fuel: Sand Rated Capacity: 98 tons/hr

Emission Unit vented through this Emission Point: EU 154

Emission Unit Description: Manual Muller Bin

Raw Material/Fuel: Sand Rated Capacity: 140 tons/hr

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

(1) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 88-A-014-S2

99-TV-058R1 40 December 10<sup>th</sup>, 2008

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 88-A-014-S2

Pollutant: PM-10

Emission Limit(s): 2.75 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S2

### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 83 Stack Diameter (inches, dia.): 31 Exhaust Flow Rate (scfm): 25,200 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No

Authority for Requirement: 567 IAC 22.108(3)

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### **CAM Plan for CE-304 Baghouse**

This emission point shall conform to the conditions listed below

#### **Emission Unit**

• Associated Emission Unit: EU 107, Manual Shakeout

EU 118, Manual Muller EU 129, Manual Return Sand EU 154, Manual Muller Bin

Associated Emission Point: EP 205

Control Equipment: Baghouse CE 304

• Pollutant Controlled: Particulate Matter (PM), PM-10

### **Applicable Requirements**

See Iowa DNR Construction Permit 88-A-014-S2

### **Monitoring Approach**

### **General Monitoring Guidelines**

- CAM involves the observation of control equipment <u>compliance indicators</u>, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emission monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

### **Excursion from Compliance Indicators**

- An <u>excursion</u> occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- Dexter will take <u>corrective action</u> in accordance with the severity of the excursion.
   Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective action will result in one of the following:
  - o If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - o If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emission, a Method 9 observation is required to determine opacity.

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- If a Method 9 observation is made that exceeds the indicator opacity, then an <u>indicator opacity exceedence</u> has occurred. The indicator opacity for this emission point is 10%.
- In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a <u>violation</u> has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, Dexter will perform the following follow-up actions, *as applicable*:
  - o Continue corrective actions.
  - o Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emission).
  - o Promptly orally report the indicator opacity exceedance, file a written indicator opacity exceedance report to both field office and central office (Compliance Unit) of IDNR.
  - o Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); within seven days of the excess emissions, file a written excess emissions report with both the field office and central office (Compliance Unit) of IDNR.
  - o Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with the emission limit, Dexter will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with the emission limit, Dexter will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emissions limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

### Compliance Indicator Ranges

- Visible Emissions
  - o Observation of no visible emissions.
- Differential Pressure
  - o Acceptable indicator range: 5" to 8" W.C.

### Monitoring Methods

- Daily
  - o Check for dust collector differential pressure.
- Weekly
  - o Observe for visible emissions during material handling of unit.
  - o Check for dust collector differential pressure.
- Monthly
  - o Inspect dust collector cleaning sequence
  - Check hopper function and performance.
- Quarterly
  - o Inspect bags for leaks and wear
- Semi-Annually
  - o Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

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#### **Performance Criteria**

#### <u>Data Representativeness</u>

An observation of visible emissions could indicate a decrease in the performance of the dust collector and an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate performance by the dust collector and potentially an increase in particulate emissions.

### Record Keeping and Reporting (Verification of Operational Status)

- Dexter will maintain records of the following:
  - o Daily logs of differential pressure readings.
  - o Weekly logs of emissions observations.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance.
     The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - o All corrective actions resulting from compliance indicators and inspections and maintenance.
  - o Excursion, indicator opacity exceedence, and excess emissions reports.
- Records will be kept for at least five (5) years and be available to the IDNR upon request.

### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- Dexter will maintain an adequate inventory of spare parts.

### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspection performed on the dust collector and actions resulting from the inspection.

#### **Justification**

#### Selection of Compliance Indicators

Visible emissions and differential pressure readings were selected as performance indicators because they demonstrate the dust collector's function of collecting particulate matter (effectiveness of cleaning cycle, loose or collapsed bag, etc.). How well the dust collector collects particulate matter will demonstrate the likelihood of compliance with applicable requirements.

### Selection of Compliance Indicator Ranges

The ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendation for the indicators.

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## Test Data

Particulate emissions testing was completed November 16, 2001 for the baghouse before the manual muller bin was vented to it. Normal baghouse operations were observed during the test.

Authority for Requirement: 567 IAC 22.108(3)

### **Emission Point ID Number: EP 111F (Internally Vented)**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 111, EU 113, EU 114-111F

Emissions Control Equipment ID Number: CE 311

Emissions Control Equipment Description: Cartridge Filter

Emission Unit vented through this Emission Point: EU 111, EU 113, EU 114-111F

Emission Unit Description: Tumbler 1; Castings

Tumbler 2; Castings Grinding; Castings

Raw Material/Fuel: Metal Castings

Rated Capacity: 9.0 tons/hr each tumbler, 6.88 tons/hr Grinding; Castings

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

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### **Emission Point ID Number: EP 112F (Internally Vented)**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 112, EU 114-112F

Emissions Control Equipment ID Number: CE 310

Emissions Control Equipment Description: Cartridge Filter

Emission Unit vented through this Emission Point: EU 112, EU 114-112F

Emission Unit Description: Tumblers 3 & 4; Castings

Grinding; Castings

Raw Material/Fuel: Metal Castings

Rated Capacity: 7.5 tons/hr Tumblers, 6.88 tons/hr Grinding; Castings

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes	No	$ert \Delta$
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Facility Maintained Operation & Maintenance Plan Required? Yes No 🖂

Compliance Assurance Monitoring (CAM) Plan Required?

Yes No X

Authority for Requirement: 567 IAC 22.108(3)

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### **Emission Point ID Number: EP 114F (Internally Vented)**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 114-114F Emissions Control Equipment ID Number: CE 314

Emissions Control Equipment Description: Cartridge Filter

Emission Unit vented through this Emission Point: EU 114-114F

Emission Unit Description: Grinding; Castings

Raw Material/Fuel: Metal Castings

Rated Capacity: 6.88 tons/hr Grinding; Castings

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No
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Facility Maintained Operation & Maintenance Plan Required? Yes No 🖂

## Compliance Assurance Monitoring (CAM) Plan Required? Yes $\square$ No $\boxtimes$

Authority for Requirement: 567 IAC 22.108(3)

99-TV-058R1 48 December 10<sup>th</sup>, 2008

### **Emission Point ID Number: EP 208**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 117AB, EU 153

Emissions Control Equipment ID Number: CE 307 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 117AB

Emission Unit Description: Disa A & B Muller

Raw Material/Fuel: Sand Rated Capacity: 70 tons/hr

Emission Unit vented through this Emission Point: EU 153

Emission Unit Description: Manual Dump Station

Raw Material/Fuel: Sand Rated Capacity: 70 tons/hr

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 95-A-380-S2

An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.3(4)6

Iowa DNR Construction Permit 95-A-380-S2

Pollutant: PM-10

Emission Limit(s): 1.96 lbs/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-380-S2

99-TV-058R1 49 December 10<sup>th</sup>, 2008

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Operating Limits**

Operating limits for this emission unit shall be:

A. The total throughput of each emission unit listed in this permit shall not exceed 70 tons per hour.

### Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The date, the total hours of operation for the emission units listed in this permit, and the total throughput of sand for the emission units listed in this permit.
- B. The total hourly sand throughput for the emission units listed in this permit.

Authority for Requirement: Iowa DNR Construction Permit 95-A-380-S2

### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 60 Stack Diameter (inches, dia.): 24 Exhaust Flow Rate (scfm): 22,900 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 95-A-380-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

99-TV-058R1 50 December 10<sup>th</sup>, 2008

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

### **Stack Testing:**

Pollutant - PM

Stack Test to be Completed by (date): Within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

Test Method - 40 CFR 60, Appendix A, Method 5

Authority for Requirement - Iowa DNR Construction Permit 95-A-380-S2

Note: The above stack test was completed 02/23/00 (Dexter Company took a 70 ton/hour production limit in lieu of retesting).

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

99-TV-058R1 51 December 10<sup>th</sup>, 2008

# **Emission Point ID Number: EP 119F (Internally Vented)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 119	
Emission Unit vented through this Emission Point: EU 119 Emission Unit Description: Prepared Sand Transfer Raw Material/Fuel: Sand Rated Capacity: 100.0 tons/hr	
Applicable Requirements	
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified.	fied below.
Pollutant: Opacity Emission Limits: 40 % Authority for Requirement: 567 IAC 23.3(2)"d"	
Pollutant: Particulate Matter (PM) Emission Limits: 0.1gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a"	
Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring below.	requirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

99-TV-058R1 52 December 10<sup>th</sup>, 2008

### **Emission Point ID Number: EP 120F (Internally Vented)**

Associated	Eq	ui	pment

### **Applicable Requirements**

Emission Unit vented through this Emission Point: EU 120

Emission Unit Description: Manual Mold

Associated Emission Unit ID Numbers: EU 120

Raw Material/Fuel: Mold Sand Rated Capacity: 43.69 tons/hr

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

### **Emission Point ID Number: EP 122F (Internally Vented)**

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### **Applicable Requirements**

Emission Unit vented through this Emission Point: EU 122

Emission Unit Description: Resin Sand Storage

Associated Emission Unit ID Numbers: EU 122

Raw Material/Fuel: Resin Sand Rated Capacity: 60.0 tons/hr

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

99-TV-058R1 54 December 10<sup>th</sup>, 2008

### **Emission Point ID Number: EP 211**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 123 Emissions Control Equipment ID Number: CE 309 Emissions Control Equipment Description: Bag Filter

Emission Unit vented through this Emission Point: EU 123

Emission Unit Description: Core Sand Storage

Raw Material/Fuel: Mold/Core Material

Rated Capacity: 60.00 tons/hr

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 86-A-043-S2

Pollutant: PM-10

Emission Limit(s): 0.36 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 86-A-043-S2

99-TV-058R1 55 December 10<sup>th</sup>, 2008

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 25

Stack Diameter (inches, dia.): 8 Exhaust Flow Rate (scfm): 800 Exhaust Temperature (°F): 70 Discharge Style: Downward

Authority for Requirement: Iowa DNR Construction Permit 86-A-043-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

99-TV-058R1 56 December 10<sup>th</sup>, 2008

# **Emission Point ID Number: EP 124F (Internally Vented)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 124	
Emission Unit vented through this Emission Point: EU 124 Emission Unit Description: Shell Core Making Raw Material/Fuel: Sand Rated Capacity: 0.738 tons/hr	
Applicable Requirements	
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specifie	ed below.
Pollutant: Opacity Emission Limits: 40 %	
Pollutant: Particulate Matter (PM) Emission Limits: 0.1gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a"	
Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring rebelow.	equirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

99-TV-058R1 57 December 10<sup>th</sup>, 2008

### **Emission Point ID Number: EP 238 - Exhaust**

**Associated Equipment** 

Associated Emission Unit ID Numbers: EU 126

Emission Unit vented through this Emission Point: EU 126

Emission Unit Description: Isocure Core Making

Raw Material/Fuel: Sand

Rated Capacity: 1.5 tons core sand per hour (Maximum Capacity)

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 05-A-564-S2

Pollutant: PM-10

Emission Limit(s): 0.052 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 29.45 tons/yr

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

99-TV-058R1 58 December 10<sup>th</sup>, 2008

Pollutant: Lead Compounds Emission Limit(s): 8.19 tons/vr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Single HAP (4)

Emission Limit(s): 9.32 tons/yr (3)

- Each individual HAP with the exception of lead compounds, manganese compounds and hexane.
- Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Total HAP

Emission Limit(s): 22.31 tons/yr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Operating Limits**

Operating limits for these emission units shall be:

- A. The equipment covered by this construction permit includes the following core making machines: Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, Alpha Set and the CB-22-SA machine. Installation of a new core making machine may require a modification to this permit.
- B. The amount of Isocure resin part I used in these emissions units shall not exceed 134,858 pounds in any rolling twelve-month period.
- C. The amount of Isocure resin part II used in these emissions units shall not exceed 111,060 pounds in any rolling twelve-month period.
- D. The amount of Isofast Catalyst 705 shall not exceed 16,031 pounds in any rolling twelvemonth period.
- E. The amount of Zip-Slip Release Agent used shall not exceed 1000 pounds in any rolling twelve-month period. It shall be assumed that the VOC content of the Zip-Slip Release Agent is 100%.
- F. The Zip-Slip Release Agent used in the coremaking process shall not contain any HAPs <sup>(1)</sup>.
- G. The catalyst used in the coremaking process shall not contain any HAPs (1).
- H. This permit is based on information provided by the permittee that only Isocure resins (a phenolic urethane cold box binder system) shall be used in the core making machines. Prior to using other binder systems that contain HAP, the permittee shall notify the Iowa DNR, Air Quality Bureau in writing.
- (1) Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Table A that is attached to Form 112(g) which is part of the Air Construction Permit Application or contact the Iowa DNR Air Quality Bureau.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

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#### Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following

- A. The permittee shall maintain a current list of all resins, catalyst and other chemicals (e.g. Zip-Slip Release Agent) in use for this emissions unit. This list shall include: material safety data sheets (MSDS), manufacturer's product specifications, and material VOC content reports for each resin, catalyst, and release agent used, showing at least the product manufacturer, product name and code, and VOC and HAP content.
- B. The permittee shall maintain the following daily records on the Isocure coremaking machines:
  - i. The amount of sand used (pounds);
  - ii. The amount of resin and catalyst used (pounds). This shall be determined in the following way:
    - a. Pounds of Total Resin = (1.6 / 100) x Pounds of Sand Where, 1.6 is the maximum percentage of total Isocure resin in the mixed sand.
    - b. Pounds of Isocure Resin Part I = (55 / 100) x Pounds of Total Resin Where, 55 is the percent of Isocure Resin Part I in the total resin.
    - c. Pounds of Isocure Resin Part II = (45/100) x Pounds of Total Resin Where, 45 is the percent of Isocure Resin Part II in the total resin.
    - d. Pounds of catalyst =  $1.5 \times (\text{pounds of sand/} 2000)$ Where, 1.5 is the amount of catalyst used in pounds per ton of sand.
  - iii. The emission rate of each individual HAP from the Isocure coremaking machines (pounds);
  - iv. The emission rate of total HAP from the Isocure coremaking machines (pounds).
- C. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).
- D. The permittee shall maintain the following monthly records:
  - i The amount of Zip-Slip Release Agent used (pounds);
  - ii The rolling 12-month total of the Zip-Slip Release Agent used (pounds);
  - The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B

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- Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- iv The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- v The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- vi The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- E. The daily emissions of individual HAPs from the Isocure coremaking machines shall be calculated by using the following equations:

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Eph = \sum_{i} 2/100 x P<sub>i</sub>/100 x R<sub>i</sub>
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Efo =  $\sum_{i} \frac{2}{100} \times FO_{i} / 100 \times R_{i}$ 

Ena =  $\sum_{i}$  9/100 x NA<sub>i</sub>/100 x R<sub>i</sub>

 $Ecu = \sum_{i} 9/100 \times CU_{i}/100 \times R_{i}$ 

 $Exy = \sum_{i} 9/100 \times XY_{i}/100 \times R_{i}$ 

Where,

Eph = pounds of phenol emitted, Efo = pounds of formaldehyde emitted, Ena = pounds of naphthalene emitted, Ecu = pounds of cumene emitted, Exy = pounds of xylene emitted

 $P_i$  = percent (%) of phenol in resin i,  $FO_i$  = percent (%) of formaldehyde in resin i,  $NA_i$  = percent (%) of naphthalene in resin i,  $CU_i$  = percent (%) of cumene in resin i,  $XY_i$  = percent (%) of xylene in resin i.

 $R_i$  = amount of resin type i used during the day (pounds)

- 2 = percent of phenol and formaldehyde emitted during coremaking, from U. S. EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013), December 2002, Table B-5
- 9 = percent of naphthalene, cumene, and xylene emitted during coremaking, from U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013)</u>, December 2002, Table B-5

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- F. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Section 10. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- G. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Section 15. D. when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- H. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Section 15. D. when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 27.92

Stack Opening, (inches, dia.): 26 Exhaust Flow Rate (scfm): 4,600 Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed Discharge

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

The following equipment vents through this emission point: Six coremaking machines, Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, CB-22-SA and the Alpha Set.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

### **Emission Point ID Number: EP 239 - Exhaust**

**Associated Equipment** 

Associated Emission Unit ID Numbers: EU 126

Emission Unit vented through this Emission Point: EU 126

Emission Unit Description: Isocure Core Making

Raw Material/Fuel: Sand

Rated Capacity: 1.5 tons core sand per hour (Maximum Capacity)

### **Applicable Requirements**

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 05-A-565-S2

Pollutant: PM-10

Emission Limit(s): 0.052 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 29.45 tons/yr

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

99-TV-058R1 65 December 10<sup>th</sup>, 2008

Pollutant: Lead Compounds Emission Limit(s): 8.19 tons/vr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Single HAP (4)

Emission Limit(s): 9.32 tons/yr (3)

- <sup>(4)</sup> Each individual HAP with the exception of lead compounds, manganese compounds and hexane.
- Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Total HAP

Emission Limit(s): 22.31 tons/yr (3)

Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Limits**

Operating limits for these emission units shall be:

- I. The equipment covered by this construction permit includes the following core making machines: Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, Alpha Set and the CB-22-SA machine. Installation of a new core making machine may require a modification to this permit.
- J. The amount of Isocure resin part I used in these emissions units shall not exceed 134,858 pounds in any rolling twelve-month period.
- K. The amount of Isocure resin part II used in these emissions units shall not exceed 111,060 pounds in any rolling twelve-month period.
- L. The amount of Isofast Catalyst 705 shall not exceed 16,031 pounds in any rolling twelvemonth period.
- M. The amount of Zip-Slip Release Agent used shall not exceed 1000 pounds in any rolling twelve-month period. It shall be assumed that the VOC content of the Zip-Slip Release Agent is 100%.
- N. The Zip-Slip Release Agent used in the coremaking process shall not contain any HAPs <sup>(1)</sup>.
- O. The catalyst used in the coremaking process shall not contain any HAPs (1).
- P. This permit is based on information provided by the permittee that only Isocure resins (a phenolic urethane cold box binder system) shall be used in the core making machines. Prior to using other binder systems that contain HAP, the permittee shall notify the Iowa DNR, Air Quality Bureau in writing.
- (1) Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Table A that is attached to Form 112(g) which is part of the Air Construction Permit Application or contact the Iowa DNR Air Quality Bureau.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

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#### Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following

- A. The permittee shall maintain a current list of all resins, catalyst and other chemicals (e.g. Zip-Slip Release Agent) in use for this emissions unit. This list shall include: material safety data sheets (MSDS), manufacturer's product specifications, and material VOC content reports for each resin, catalyst, and release agent used, showing at least the product manufacturer, product name and code, and VOC and HAP content.
- B. The permittee shall maintain the following daily records on the Isocure coremaking machines:
  - i. The amount of sand used (pounds);
  - ii. The amount of resin and catalyst used (pounds). This shall be determined in the following way:
    - a. Pounds of Total Resin = (1.6 / 100) x Pounds of Sand Where, 1.6 is the maximum percentage of total Isocure resin in the mixed sand.
    - b. Pounds of Isocure Resin Part I = (55 / 100) x Pounds of Total Resin Where, 55 is the percent of Isocure Resin Part I in the total resin.
    - c. Pounds of Isocure Resin Part II = (45/100) x Pounds of Total Resin Where, 45 is the percent of Isocure Resin Part II in the total resin.
    - d. Pounds of catalyst =  $1.5 \times (\text{pounds of sand/} 2000)$ Where,  $1.5 \times (\text{pounds of sand} \times \text{pounds per ton of sand})$
  - iii. The emission rate of each individual HAP from the Isocure coremaking machines (pounds);
  - iv. The emission rate of total HAP from the Isocure coremaking machines (pounds).
- C. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).
- D. The permittee shall maintain the following monthly records:
  - i The amount of Zip-Slip Release Agent used (pounds);
  - ii The rolling 12-month total of the Zip-Slip Release Agent used (pounds);
  - The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B

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- Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- iv The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- v The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- vi The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- E. The daily emissions of individual HAPs from the Isocure coremaking machines shall be calculated by using the following equations:

```
Eph = \sum_{i} 2/100 x P<sub>i</sub>/100 x R<sub>i</sub>
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Efo =  $\sum_{i} \frac{2}{100} \times FO_{i} / 100 \times R_{i}$ 

Ena =  $\sum_{i}$  9/100 x NA<sub>i</sub>/100 x R<sub>i</sub>

 $Ecu = \sum_{i} 9/100 \times CU_{i}/100 \times R_{i}$ 

 $Exy = \sum_{i} 9/100 \times XY_{i}/100 \times R_{i}$ 

Where,

Eph = pounds of phenol emitted, Efo = pounds of formaldehyde emitted, Ena = pounds of naphthalene emitted, Ecu = pounds of cumene emitted, Exy = pounds of xylene emitted

 $P_i$  = percent (%) of phenol in resin i,  $FO_i$  = percent (%) of formaldehyde in resin i,  $NA_i$  = percent (%) of naphthalene in resin i,  $CU_i$  = percent (%) of cumene in resin i,  $XY_i$  = percent (%) of xylene in resin i.

 $R_i$  = amount of resin type i used during the day (pounds)

- 2 = percent of phenol and formaldehyde emitted during coremaking, from U. S. EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013), December 2002, Table B-5
- 9 = percent of naphthalene, cumene, and xylene emitted during coremaking, from U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013)</u>, December 2002, Table B-5

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- F. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Section 10. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- G. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Section 15. D. when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- H. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Section 15. D. when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 26.83

Stack Opening, (inches, dia.): 26 Exhaust Flow Rate (scfm): 6,000 Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed Discharge

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

The following equipment vents through this emission point: Six coremaking machines, Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, CB-22-SA and the Alpha Set.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: EP 147F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 147	
Emission Unit vented through this Emission Point: EU 147 Emission Unit Description: Haul Road Raw Material/Fuel: VMT Rated Capacity: 2.2 VMT/hr	
<b>Applicable Requirements</b>	
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specif	ied below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to or stored; or a building, its appurtenances or a construction haul road altered, repaired or demolished, without taking reasonable precaution All persons shall take reasonable precautions to prevent the discharge fugitive dusts beyond the lot line of the property on which the emissions	to be used, constructed, ns to prevent a nuisance. e of visible emissions of
Authority for Requirement: 567 IAC 23.3(2)"c"	
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring below.	requirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

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Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: EP 148F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 148	
Emission Unit vented through this Emission Point: EU 148	
Emission Unit Description: Charging Chute	
D M-41/C1. C July	

Raw Material/Fuel: Scrap Iron Rated Capacity: 20 ton/hr

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Authority for Requirement: 567 IAC 22.108(3)

## **Monitoring Requirements**

Withing Requirements	
The owner/operator of this equipment shall comply with the monitoring re-	equirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

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## **Emission Point ID Number: EP 149F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 149
Emission Unit vented through this Emission Point: EU 149 Emission Unit Description: Coke Storage Pile Raw Material/Fuel: Coke Rated Capacity: 2.34 ton/hr
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)  The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring requirements listed below.  Agency Approved Operation & Maintenance Plan Required?  Yes \Boxedow No \Boxedow
Facility Maintained Operation & Maintenance Plan Required?  Yes  No

Yes 🗌 No 🔀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan Required?

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# **Emission Point ID Number: EP 150F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 150
Emission Unit vented through this Emission Point: EU 150 Emission Unit Description: Limestone Storage Pile Raw Material/Fuel: Limestone Rated Capacity: 0.8 ton/hr
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)  The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?  Yes No

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## **Emission Point ID Number: EP 230-Vent**

**Associated Equipment** 

Associated Emission Unit ID Numbers: EU 157-Vent 230

Emission Unit vented through this Emission Point: EU 157-Vent 230

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-386

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2) "a"

Iowa DNR Construction Permit 04-A-386

Pollutant: PM-10

Emission Limit(s): 0.05 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-386

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 55.5 Exhaust Flow Rate (scfm): 16,800 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-386

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The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🗵

### **Emission Point ID Number: EP 231-Vent**

## **Associated Equipment**

Associated Emission Unit ID Numbers: EU 157-Vent 231

Emission Unit vented through this Emission Point: EU 157-Vent 231

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-387

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-387

Pollutant: PM-10

Emission Limit(s): 0.12 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-387

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 55.5 Exhaust Flow Rate (scfm): 40,320 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-387

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

### **Emission Point ID Number: EP 232-Vent**

## **Associated Equipment**

Associated Emission Unit ID Numbers: EU 157-Vent 232

Emission Unit vented through this Emission Point: EU 157-Vent 232

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-388

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)a

Iowa DNR Construction Permit 04-A-388

Pollutant: PM-10

Emission Limit(s): 0.053 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-388

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 38.5 Exhaust Flow Rate (scfm): 17,785 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-388

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes ☐ No ⊠
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🔀

Authority for Requirement: 567 IAC 22.108(3)

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### **Emission Point ID Number: EP 233-Vent**

## **Associated Equipment**

Associated Emission Unit ID Numbers: EU 157-Vent 233

Emission Unit vented through this Emission Point: EU 157-Vent 233

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

(1) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-389

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-389

Pollutant: PM-10

Emission Limit(s): 0.050 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-389

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#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 38.5 Exhaust Flow Rate (scfm): 16,165 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-389

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

### **Emission Point ID Number: EP 234-Vent**

## **Associated Equipment**

Associated Emission Unit ID Numbers: EU 157-Vent 234

Emission Unit vented through this Emission Point: EU 157-Vent 234

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40% (1)

An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-390

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-390

Pollutant: PM-10

Emission Limit(s): 0.051 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-390

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#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 31 Stack Diameter (inches, dia.): 38.5 Exhaust Flow Rate (scfm): 17,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-390

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes ☐ No ⊠
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🔀

# **Emission Point ID Number: EP 158F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 158	
Emission Unit vented through this Emission Point: EU 158 Emission Unit Description: Yard Traffic Raw Material/Fuel: VMT Rated Capacity: 1.1 VMT/hr	
Applicable Requirements	
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified below	ow.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be har or stored; or a building, its appurtenances or a construction haul road to be altered, repaired or demolished, without taking reasonable precautions to properly all persons shall take reasonable precautions to prevent the discharge of visit fugitive dusts beyond the lot line of the property on which the emissions original	used, constructed, revent a nuisance. sible emissions of
Authority for Requirement: 567 IAC 23.3(2)"c"	
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring require below.	ements listed
Agency Approved Operation & Maintenance Plan Required? Yes	No
Facility Maintained Operation & Maintenance Plan Required? Yes	□ No ⊠
Compliance Assurance Monitoring (CAM) Plan Required? Yes	□ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

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# **Emission Point ID Number: EP 159F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 159
Emission Unit vented through this Emission Point: EU 159 Emission Unit Description: Temporary Sand Storage Pile Raw Material/Fuel: Sand Rated Capacity: 5.66 tons/hr
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)  The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? Yes 🗌 No 🖂

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# **Emission Point ID Number: EP 160F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 160
Emission Unit vented through this Emission Point: EU 160 Emission Unit Description: Permanent Sand Storage Pile Raw Material/Fuel: Sand Rated Capacity: 5.66 tons/hr
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)  The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?  Yes  No

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## IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

## G1. Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"

## **G2. Permit Expiration**

- 1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

### **G3.** Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

## **G4.** Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the

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compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

## **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

#### **G6.** Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
  - a. Form 1.0 "Facility Identification";
  - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
  - c. Form 5.0 "Title V annual emissions summary/fee"; and
  - d. Part 3 "Application certification."
- 4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
  - a. Form 1.0 "Facility Identification";
  - b. Form 5.0 "Title V annual emissions summary/fee";
  - c. Part 3 "Application certification."
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

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## G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

## **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

## **G9.** General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

## G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

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- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

## G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

# G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

#### G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

## G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a

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violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

## 2. Excess Emissions Reporting

- a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:
  - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.
  - iii. The time and expected duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps being taken to remedy the excess emission.
  - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
  - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.
  - iii. The time and duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps that were taken to remedy and to prevent the recurrence of the

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incident of excess emission.

- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The facility at the time was being properly operated;
  - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
  - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. 567 IAC 22.108(16)

## **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

# **G16.** Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

# G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under

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- section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
- b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
  - i. A brief description of the change within the permitted facility,
  - ii. The date on which the change will occur,
  - iii. Any change in emission as a result of that change,
  - iv. The pollutants emitted subject to the emissions trade
  - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
  - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 22.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

## G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that is required to do any of the following:
    - i. Correct typographical errors
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the

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#### source;

- iii. Require more frequent monitoring or reporting by the permittee; or iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

#### 2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
  - i. Do not violate any applicable requirements
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
  - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
  - ii. The permittee's suggested draft permit
  - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee

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need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

## **G19. Duty to Obtain Construction Permits**

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1) **G20. Asbestos** 

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. 567 IAC 23.1(3)"a", and 567 IAC 23.2

### **G21.** Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

## G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

## G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a

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- class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

## **G24. Permit Reopenings**

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as

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practicable, but not later than 18 months after the promulgation of such standards and regulations.

- a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
- b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
- c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination; by The department or the administrator determines that the Title V permit centains a
  - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
  - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
  - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)

#### G25. Permit Shield

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the permit; or
    - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

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- 3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act:
  - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

#### **G26.** Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

## **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

## **G28.** Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

### G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

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Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

## G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

#### **G32.** Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits

EPA Region 7

Air Permits and Compliance Branch

901 N. 5<sup>th</sup> Street

Kansas City, KS 66101

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-5100

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Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

### Field Office 1

909 West Main – Suite 4 Manchester, IA 52057 (563) 927-2640

### Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

#### Field Office 5

401 SW 7<sup>th</sup> Street, Suite I Des Moines, IA 50309 (515) 725-0268

## **Polk County Public Works Dept.**

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

### Field Office 2

P.O. Box 1443 2300-15th St., SW Mason City, IA 50401 (641) 424-4073

### Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

#### Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

## **Linn County Public Health Dept.**

Air Pollution Control Division 501 13th St., NW Cedar Rapids, IA 52405 (319) 892-6000